

DECLARATION OF JOSEPH C. MANIACI, JR.

Pursuant to 28 U.S.C. § 1746, the undersigned states as follows:

1. My name is Joseph C. Maniaci, Jr.
2. I am over twenty-one years of age
3. I have personal knowledge of the matters set forth in this declaration.
4. I am a resident of the State of New Jersey.
5. I am the founder and owner of Integrated Wealth Strategies, LLC (“IWS”), a financial and insurance consulting firm.
6. I was introduced to Drive Planning, LLC (“Drive Planning” or “Drive”) by David Bradford (“Bradford”), a former Drive executive, when we met at a February 2019 life insurance industry conference.
7. After our meeting, Drive subsequently referred some of its clients to IWS for financial and insurance consulting services.
8. On or about March 28, 2023, Bradford visited IWS’s offices in New Jersey with Drive Planning’s founder and CEO, Russell Todd Burkhalter (“Burkhalter”).
9. During that visit, Burkhalter and Bradford promoted Drive’s Real Estate Acceleration Loan (“REAL”) program to me.
10. Burkhalter and Bradford told me that the REAL program was designed to provide bridge loans for highly profitable real estate development deals.
11. Based on our conversations, my understanding of REAL was that investors would sign promissory notes to provide funds to Drive, which Drive would then pool and provide to a developer.
12. Based on our conversations, my understanding of REAL was that the developer

then would use the REAL funds to purchase raw land and prepare it for construction, to later sell at a profit or to receive rental income, with returns benefiting Drive and the REAL investors.

13. Burkhalter and Bradford informed me that REAL participants would receive a ten percent (10%) rate of return on their promissory note every three (3) months, and that there was the choice to “roll over” the investment plus “interest,” or withdraw all or a portion of it, at the end of each three (3) month term.

14. Burkhalter and Bradford also said that investments were protected by Drive’s ownership of real property as collateral underlying REAL.

15. IWS initially invested Twenty-five thousand dollars (\$25,000) of its own funds into the REAL program, in or about February 16, 2021.

16. IWS chose to “roll over” the funds for five (5) quarters, and withdrew the funds plus interest earned on Twenty-five thousand dollars (\$25,000), receiving a total of (\$48,717.92).

17. Reassured by the ten percent (10%) return IWS received as Drive had promised, IWS began to refer certain of its clients to Drive Planning’s REAL program in exchange for a commission payment to IWS of four percent (4%) for each new REAL investor.

18. IWS employee Angelo Sandone managed the administrative duties relating to IWS clients who chose to invest in Drive’s REAL program.

19. In referring clients to Drive, IWS used promotional materials provided by Drive Planning, including but not limited to links to Drive’s website.

20. During the time IWS invested in REAL and referred its clients to Drive, I believed that the REAL funds were being used for real estate development projects, which would in turn lead to revenue to be used to pay the ten percent (10%) per-quarter returns to investors.

21. My belief was based on representations from Drive, including the information I

received directly from conversations with Burkhalter and Bradford, and the information contained in Drive promotional material, such as those contained in Exhibit A and located on Drive's website at <https://realandcore.com/real/>.

22. During the time IWS invested in REAL and referred its clients to Drive, I was not told that the investments would or could be used by Drive to make interest payments to earlier investors.

23. During the time IWS invested in REAL and referred its clients to Drive, I also was not told that investments would or could be used by Drive to pay back principal to earlier investors.

24. Relating to the withdrawal of IWS's initial investment plus interest from the REAL program in February 16, 2021, I was never told that IWS would or could be paid interest out of other people's investments rather than Drive Planning profits from its business activities.

25. During the time IWS invested in REAL and referred its clients to Drive, I was not told that investments would or could be used directly by Drive to fund the personal expenses of Drive's management, including Mr. Burkhalter.

26. During the time IWS invested in REAL and referred its clients to Drive, I was not told that certain of the properties paid for by Drive using investor funds were not owned by Drive, including many of the properties listed as Drive collateral in Exhibit A.

27. On June 4, 2024, I received notice from Drive via electronic mail message that it was halting new investments in REAL as of June 15.

28. On June 5, 2024, I had a phone call with Burkhalter, and asked him if there was a potential regulatory issue with Drive Planning.

29. Burkhalter responded that there was no regulatory issue, and that the halt in the

REAL program was due to an internal audit.

30. On June 5, 2024, I had a phone call with Bradford, and asked him if there was a potential regulatory issue with Drive Planning.

31. Bradford responded that there was no regulatory issue, and that the halt in the REAL program was due to an internal audit.

32. On June 10, 2024, I received notice from Drive via electronic mail message that it was suspending all new REAL and CORE promissory notes.

33. On the evening of June 11, 2024, I received notice from Drive via electronic mail message that Bradford had tendered his resignation as an executive of Drive.

34. On June 14, 2024, my colleague Mr. Angelo Sandone received notice from Drive via electronic mail stating in bold capital letters that: 'DRIVE PLANNING IS STILL OPERATING AS USUAL.'

35. On June 25, 2024, I received notice from Drive via electronic mail message stating that Drive is under current scrutiny from the US Government and Drive has been instructed by them to let this process take its course.

36. On evening of June 25, 2024, I received notice from Drive via electronic mail message directly from Mr. Burkhalter stating that the US Government has mandated that no payments be made (from the REAL and CORE funds) during this time of evaluation of the assets.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 16, 2024.



Joseph C. Maniaci, Jr.

Exhibit A

THE DRIVE PLANNING

Portfolio | of | Real | Estate | Investments

2/1/2024

The REAL Opportunity not only has partners that we work with to offer bridge loans and profit sharing in their real estate deals, but also has the full support of the assets of Drive Planning's own Portfolio of Real Estate Investments.

In addition to this, Drive Planning - as the custodian and manager of the REAL Opportunity - keeps millions of dollars in cash for future opportunities and to insure over 50% of the promissory notes for any given year.

Below is an up to date list of the collateral that Drive Planning has secured to insure the REAL notes.

<div>Staurolite Barn Event Center Blue Ridge, GA</div> <div>\$4,000,000</div> <div>Cashflowing</div>	<div>330 E. 2nd St. Blue Ridge, Ga 30513</div> <div>\$900,000</div>	<div>308 E. Alden St. Valdosta, Ga</div> <div>\$325,000</div>	<div>147 Piney Rd. Mineral Bluff, Ga 30559 60 acres</div> <div>\$7,899,000</div> <div>3 Mountain Houses</div>
<div>226 Golden Nugget Dr. Blairesville, Ga</div> <div>CURRENTLY LISTED TO SELL</div> <div>\$205,000</div> <div>51% increase in 11 months</div>	<div>1147 Piney Rd. Mineral Bluff, Ga 30559 60 acres</div> <div>\$4,000,000</div> <div>Selling lots</div>	<div>1019 Hardscrabble Rd. 39.5 Acres plus structure</div> <div>\$5,500,000</div> <div>Development appraisal</div>	<div>The Gemsbok 632 Cherry Lake Dr. Blue Ridge, GA 30513</div> <div>\$432,000</div> <div>135% Return in 18 months</div>
<div>Drive Montana Properties, LLC</div> <div>\$3,200,000</div> <div>Asset Value</div>	<div>Drive Planning, LLC</div> <div>\$29,000,000</div> <div>Assets</div>	<div>The Burkhalter Ranch, LLC</div> <div>\$25,000,000</div> <div>Drive Gulfport Properties, LLC</div>	<div>TBR Western Store, TBR Outdoors</div> <div>\$13,000,000</div> <div>\$2,200,000</div>
<div>Coles Crossing Blue Ridge, GA</div> <div>\$850,000</div>	<div>St. Petersburg-Bliss</div> <div>\$2,800,000</div>	<div>10075 Blue Ridge Drive Blue Ridge, GA 30513</div> <div>\$2,000,000</div>	<div>116th Ave Fishers, IN</div> <div>\$5,000,000</div>
<div>270 Madola Rd. Blue Ridge, GA 30513</div> <div>\$475,000</div>	<div>The Preserve at Conley Creek, Atlanta</div> <div>\$15,150,000</div> <div></div>	<div>100 1st AVE N, #3104, ST Petersburg, FL 33701</div> <div>\$2,700,000</div>	<div>Property #2 100 1st Ave N St Petersburg, FL</div> <div>\$1,500,000</div>
<div>The Detroit Condo St Petersburg, FL</div> <div>\$685,000</div>	<div>Panama City, FL Condo (Cashflowing)</div> <div>\$400,000</div>	<div>SFH Fishers, IN</div> <div>\$2,500,000</div>	<div>SFH 41st Ave St Petersburg FL</div> <div>\$689,000</div>
<div>Piney Rd. Mineral Bluff, Ga 28 acres.</div> <div>\$5,000,000</div>	<div>Equestrian Center Doc Roof Rd. Blue Ridge, Ga 28 acres.</div> <div>\$4,000,000</div>	<div>801 South Atlanta St. Atlanta, Ga 30075</div> <div>\$3,000,000</div>	<div>SUBTOTAL</div> <div>\$130,828,000</div>